

CHAITMAN LLP

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Presentment Date: December 28, 2015 12:00 PM

Objection Date: December 23, 2015

*Attorneys for Defendants David Gross and Irma Gross
Individually and as Joint Tenants*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

DAVID GROSS and IRMA GROSS Individually and
as Joint Tenants,

Defendants.

Adv. Pro. No. 08-1789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04667 (SMB)

**NOTICE OF PRESENTMENT OF AN ORDER
GRANTING DEFENDANTS TIME TO RETAIN NEW COUNSEL**

PLEASE TAKE NOTICE that, upon the annexed Declaration of Helen Davis Chaitman in Support of Application to give Defendants 30 days to retain new counsel, Helen Davis Chaitman of Chaitman LLP, will present the attached proposed order to the Honorable Stuart M. Bernstein, United States Bankruptcy Judge at the United States Bankruptcy Court for the Southern District of New York at One Bowling Green, New York, NY 10004, for signature on December 28, 2015 at 12:00 noon.

PLEASE TAKE FURTHER NOTICE that, unless a written objection to the proposed order, with proof of service, is filed with the Clerk of the Court and copies of such objection are served so as to be delivered to the undersigned, to the Defendants, and to counsel to the Trustee, and a courtesy copy is delivered to the Bankruptcy Judge's chambers, at least three days before the date of presentment, there will not be a hearing and the order may be signed.

PLEASE TAKE FURTHER NOTICE that, if a written objection is timely filed, the Court will notify the Defendants, Chaitman LLP, and counsel to the Trustee, of the date and time of the hearing and of the moving party's obligation to notify all other parties entitled to receive notice. In such event, the moving and objecting parties are required to attend the hearing, and failure to attend in person or by counsel may result in relief being granted or denied upon default.

Dated: December 17, 2015
New York, New York

CHAITMAN LLP

By: /s/ Helen Davis Chaitman
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